

EXHIBIT “A”

11/16/2022 11:09AM FAX 732 341 3404

Rosenberg Kirby Cahill

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DEPART

NOV 16 2022

ROSENBERG, KIRBY, CAHILL, STANKOWITZ AND RICHARDSON
 Attorneys at Law
 29 Main Street
 Toms River, New Jersey 08753
 (732)341-3337
 Attorneys for Plaintiffs

ASHA DUNDAS, single
 Plaintiffs,

v.

HARRAH'S RESORT ATLANTIC CITY;
 HARRAH'S ATLANTIC CITY, LLC; et als
 Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION: ATLANTIC COUNTY
 DOCKET NUMBER: ATL-L-2286-22

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY to the above named defendant:

✓ Harrah's Atlantic City, LLC
 777 Harrah's Boulevard
 Atlantic City, NJ 08401

Harrah's Atlantic City Resort, LLC
 777 Harrah's Boulevard
 Atlantic City, NJ 08401

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure then you must file your written answer or motion and proof of service with the Clerk of Superior Court, Hughes Justice Complex, CN 971, Trenton, NJ 08625. A filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 + \$65.00 with Counterclaim for Law Division and \$135.00 for Chancery Division and completed Case Information Statement) if you want the Court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief the plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling on of the Lawyer Referral Services. A list of these numbers is also provided.

DATED: November 16, 2022.

s/Michelle M. Smith

Michelle M. Smith, Esq., Clerk, Superior Court

Name & Address of Defendant: See above

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Rosenberg Kirby Cahill

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Atlantic County:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
Lawyer Referral
609-345-3444
Legal Services
609-348-4200

Bergen County:

Deputy Clerk of the Superior Court
Case Processing Section, Room 119
Justice Center, 10 Main St.
Hackensack, NJ 07601-0769
Lawyer Referral
201-488-0044
Legal Services
201-487-2166

Burlington County:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Floor, Courts Facility
49 Rancocas Road
Mt. Holly, NJ 08060
Lawyer Referral
609-261-4862
Legal Services
609-261-1088

Camden County:

Deputy Clerk of the Superior Court
Civil Processing Office
1st Floor, Hall of Records
101 S. Fifth Street
Camden, NJ 08103
Lawyer Referral
856-964-4520
Legal Services
856-964-2010

Cape May County:

Deputy Clerk of the Superior Court
9 N. Main Street
Box DN-209
Cape May Court House, NJ 08210
Lawyer Referral
609-463-0313
Legal Services
609-465-3001

Cumberland County:

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Sts., P.O. Box 615
Bridgeton, NJ 08302
Lawyer Referral
856-692-6207
Legal Services
856-451-0003

Essex County:

Deputy Clerk of the Superior Court
50 West Market Street
Room 131
Newark, NJ 07102
Lawyer Referral
973-622-6207
Legal Services
973-624-4500

Gloucester County:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Floor, Court House
1 North Broad Street, P.O. Box 129
Woodbury, NJ 08096
Lawyer Referral
856-848-4589
Legal Services
856-848-5360

Hudson County:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House-1st Floor
583 Newark Avenue
Jersey, City 07306
Lawyer Referral
201-798-2727
Legal Services
201-792-6363

Hunterdon County:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08862
Lawyer Referral
908-735-2611
Legal Services
908-782-7979

Mercer County:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 South Broad Street, P.O. Box 8068
Trenton, NJ 08650
Lawyer Referral
609-585-6200
Legal Services
609-695-6249

Middlesex County:

Deputy Clerk of the Superior Court
Administration Building
Third Floor
1 Kennedy Sq., P.O. Box 2633
New Brunswick, NJ 08903-2633
Lawyer Referral
732-828-0053
Legal Services
732-249-7600

Monmouth County:

Deputy Clerk of the Superior Court
71 Monument Park
P.O. Box 1269
Freehold, NJ 07728-1262
Lawyer Referral
732-431-5544
Legal Services
732-866-0020

Morris County:

Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Pl., P.O. Box 910
Morristown, NJ 07960-0910
Lawyer Referral
973-267-5882
Legal Services
973-285-6911

Ocean County:

Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754
Lawyer Referral
732-240-3666
Legal Services
732-341-2727

Passaic County:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
Lawyer Referral
973-278-9223
Legal Services
973-345-7171

Salem County:

Deputy Clerk of the Superior Court
92 Market Street, P.O. Box 18
Salem, NJ 08079
Lawyer Referral
856-935-5628
Legal Services
856-451-0003

Somerset County:

Deputy Clerk of the Superior Court
Civil Division Office
New Court House, 3rd Floor
P.O. Box 3000
Somerville, NJ 08876
Lawyer Referral
908-685-2323
Legal Services
908-231-0840

Sussex County:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
Lawyer Referral
973-267-5882
Legal Services
973-383-7400

Union County:

Deputy Clerk of the Superior Court
1st Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-6073
Lawyer Referral
908-353-4715
Legal Services
908-354-4340

Warren County:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
Belvidere, NJ 07823-1500
Lawyer Referral
973-267-5882
Legal Services
973-475-2010

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**ROSENBERG, KIRBY, CAHILL,
STANKOWITZ & RICHARDSON**

Attorneys at Law

29 Main Street

Toms River, New Jersey 08753

(732) 341-3337

Attorneys for Plaintiffs

Attorney ID: 016441992

ASHA DUNDAS, single

Plaintiff,

v.

HARRAH'S RESORT ATLANTIC CITY;
HARRAH'S ATLANTIC CITY, LLC,
ABC COMPANY (1-10) (fictitious
names, true names unknown at this time), a
business entity authorized to do business
in the State of New Jersey; XYZ
MAINTENANCE COMPANY (1-10)
(fictitious names, true names unknown
at this time), a business entity authorized to
do business in the State of New Jersey;
JOHN DOE (1-10) (fictitious names, true
names unknown at this time); JANE DOE
(1-10) (fictitious names, true names
unknown at this time);

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION : ATLANTIC COUNTY
DOCKET NO. ATL-L- 2786-22

CIVIL ACTION

COMPLAINT
(Personal Injuries)

Plaintiff, ASHA DUNDAS, presently residing in the Borough of New York, Kings County,
State of New York, through her attorneys, by way of Complaint, say:

FIRST COUNT

1. On or about May 21, 2022, plaintiff, ASHA DUNDAS, was lawfully upon premises commonly known as HARRAH'S RESORT ATLANTIC CITY, located on Harrah's Boulevard, in Atlantic City, County of Atlantic and State of New Jersey, which premises were owned and/or leased and/or operated and/or maintained

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and/or under the supervision and control of the defendants, HARRAH'S RESORT ATLANTIC CITY; HARRAH'S ATLANTIC CITY, LLC; ABC COMPANY (1-10) (fictitious names, true names unknown at this time), a business entity authorized to do business in the State of New Jersey; XYZ MAINTENANCE COMPANY (1-10) (fictitious names, true names unknown at this time), a business entity authorized to do business in the State of New Jersey; JOHN DOE (1-10) (fictitious names, true names unknown at this time); JANE DOE (1-10) (fictitious names, true names unknown at this time).

2. Plaintiff was a business invitee, and/or licensee, having gone to the aforesaid business location for foreseeable purposes.
3. While lawfully upon the premises plaintiff, ASHA DUNDAS was caused to sustain severe injuries due to an unsafe condition that existed upon said premises, which condition defendants created, tolerated, maintained, knew of or should have known of, but did not warn or alert plaintiff, ASHA DUNDAS.
4. Said unsafe condition was due to the negligence of the defendants.
5. As a result of the carelessness and negligence of the defendant, plaintiff ASHA DUNDAS, was caused to sustain severe injuries, both temporary and permanent in nature, together with great pain and suffering as well as serious economic loss, and was prevented from transacting lawful business and affairs and had to expend sums for medical expenses, all of which are expected to continue into the future.

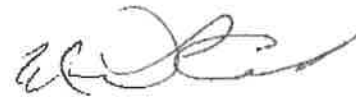
WHEREFORE, Plaintiffs demand judgment against the Defendants for damages, interest, costs of suit and such other relief as this Court may deem just and equitable.

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SECOND COUNT

1. Plaintiffs repeat each and every allegation of the First Count as if set forth at length herein.
2. On the aforesaid date and time, and at the aforesaid place, the aforesaid accident was caused by the negligent actions/inactions of JOHN DOE (1-10), fictitious names for parties yet to be identified.
3. As a result of the negligence and carelessness of JOHN DOE (1-10) (fictitious names, true names unknown at this time), plaintiff ASHA DUNDAS was caused to sustain severe injuries, both temporary and permanent in nature, together with great pain and suffering as well as serious economic loss, and was prevented from transacting lawful business and affairs and had to expend sums for medical expenses, all of which are expected to continue into the future.

WHEREFORE, Plaintiffs demand judgment against the Defendants for damages, interest, costs of suit and such other relief as this Court may deem just and equitable.



MICHAEL P. CAHILL, ESQUIRE

Dated: October 12, 2022

DESIGNATION OF TRIAL COUNSEL

Pursuant to R.4:5-1(c), Michael P. Cahill, Esquire is hereby designated as trial counsel.



MICHAEL P. CAHILL, ESQUIRE

Dated: October 12, 2022

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Rosenberg Kirby Cahill

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JURY DEMAND

PLEASE TAKE NOTICE that the Plaintiffs demand a trial by jury



MICHAEL P. CAHILL, ESQUIRE

Dated: October 12, 2022

CERTIFICATION PURSUANT TO R.4:5-1

The matter in controversy involved in this action is not the subject of any other action pending in any Court, nor of any pending arbitration proceeding and no other action or arbitration proceeding is contemplated by my client. No parties other than those named herein should be joined in this action.

I hereby certify that the foregoing is true to the best of my knowledge, information and belief.



MICHAEL P. CAHILL, ESQUIRE

Dated: October 12, 2022

CERTIFICATION PURSUANT TO R. 1:38-7(b)

I certify that confidential personal identifiers have been redacted from documents now submitted to the Court and will be redacted from documents submitted in the future in accordance with Rule 1:38-7(b).



MICHAEL P. CAHILL, ESQUIRE

Dated: October 12, 2022

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Rosenberg Kirby Cahill

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Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-002786-22

Case Caption: DUNDAS ASHA VS HARRAH'S RESORT
ATLANTIC CITY
Case Initiation Date: 10/13/2022
Attorney Name: MICHAEL PHILIP CAHILL
Firm Name: ROSENBERG KIRBY CAHILL & STANKOWITZ
Address: 29 MAIN STREET
TOMS RIVER NJ 08753
Phone: 7323413337
Name of Party: PLAINTIFF : Dundas, Asha
Name of Defendant's Primary Insurance Company
(if known): None

Case Type: PERSONAL INJURY
Document Type: Complaint with Jury Demand
Jury Demand: YES - 6 JURORS
Is this a professional malpractice case? NO
Related cases pending: NO
If yes, list docket numbers:
Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO
Does this case involve claims related to COVID-19? NO
Are sexual abuse claims alleged by: Asha Dundas? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

10/13/2022
Dated

/s/ MICHAEL PHILIP CAHILL
Signed